

NORTHWESTERN COLLEGE RADIO
Radio Group ! SkyLight Satellite Network ! Northwest Productions

July 26, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20024

Re: MM Docket 99-25 (Low Power FM Service)

Dear Ms. Salas:

Northwestern College (NWC) submits these Comments in response to the Commission's proposal to establish a new low power FM radio service (LPFM) as set forth in the Notice of Proposed Rule Making in MM Docket No. 99-25, released February 3, 1999. NWC is the licensee of nine (9) FM broadcast stations located throughout the country and has a direct interest in the outcome of the Commission's proposal.

We understand the Commission's desire and applaud the effort to find new ways to broaden the use of available spectrum. You reach a point, however, where you can hurt or damage very seriously what has already been established, as is being pointed out by many in this industry.

NWC understands that under the proposal second and third channel interference protections are reduced. This creates no benefit in the FM band, only potential interference problems. Yet, the reduction is the only way to create space for low power FM stations in most major markets. Is this a good idea? It appears to NWC that this approach only increases interference to an already heavily congested FM radio band.

Hopefully, digital signal broadcasts will move ahead in the not too distant future. This service will provide improved clarity and service to the public. The introduction of low power stations would only increase the potential to jeopardize prospects for a smooth, interference-free transition to digital.

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Magalie Roman Salas
July 26, 1999
Page 2

The proposed rule making states that ownership of a low power FM station is restricted to one license and that there cannot be other radio interests. Please follow our what if scenario. What if different individuals own stations in four city quadrants, one north, one east, one west and one south. The four signals theoretically meet in the center of the city. Just suppose these four owners get together and decide to feed the same programming over their stations. Basically, they've covered the market. This goes beyond the intent of the proposal, we know, but it's another question among the many that need to be answered based on a complete record in this proceeding.

NWC is convinced that low power FM is not the way to go. Please do not allow this proceeding to result in an LPFM service.

Sincerely,

/ s /

Harv Hendrickson
Vice President for Broadcast Support
Northwestern College